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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

HUATAI USA, LLC,  
Plaintiff,

vs.

JOHN A CHIANG d/b/a "FCB  
INTERNATIONAL,"  
Defendant.

Case No.: 4:11-cv-01855-PJH

STIPULATION EXTENDING TIME  
FOR DEFENDANT JOHN CHIANG  
d/b/a "FCB INTERNATIONAL" TO  
SERVE RESPONSES TO PLAINTIFF'S  
FIRST SET OF INTERROGATORIES  
AND DOCUMENT REQUESTS

During the Case Management Conference in this matter, held November 17, 2011, all parties agreed to exchange Initial Disclosures on or before December 19, 2011 and also to exchange written discovery requests as soon as possible. Accordingly, Plaintiff served

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HUATAI USA, LLC v. JOHN CHIANG d/b/a "FCB INTERNATIONAL"

Case No. C11-01855 PJH  
STIPULATION EXTENDING TIME FOR DEFENDANT TO  
SERVE DISCOVERY RESPONSES

1 Defendant with its First Set of Interrogatories and Requests for Production of Documents on  
2 November 21, 2011 and Defendant's responses thereto are currently due on December 21, 2011.

3 However, due to medical problems with his eyesight, Defendant John A. Chiang is  
4 currently unable to (1) return to the United States from China prior to December 21, 2011 and/or  
5 (2) read documents necessary for him to provide responses to Plaintiff's first set of written  
6 discovery.

7 In addition, Defendant may have in his possession or may be bringing back from China  
8 documents that may be responsive to Plaintiff's discovery and/or required to be disclosed under  
9 F.R.C.P. Rule 26. Defendant reserves the right to supplement the Initial Disclosures and  
10 documents produced on December 19, 2011.

11 WHEREFORE IT IS AGREED AND STIPULATED AS FOLLOWS:

12 1) All parties will exchange Initial Disclosures and documents on Monday, December  
13 19, 2011.

14 2) The deadline for Defendant's Responses to Plaintiff's First Set of Interrogatories and  
15 Document Requests is hereby extended until January 4, 2012.

16 IT IS SO STIPULATED.

17 Dated: December 19, 2011

18 \_\_\_\_\_/s/\_\_\_\_\_  
19 RICHARD DUANE  
20 Attorney for Defendant  
21 JOHN CHIANG d/b/a "FCB INTERNATIONAL"

22 Dated: December 19, 2011

23 \_\_\_\_\_/s/\_\_\_\_\_  
24 MICHAEL ONUFRAK  
Attorney for Plaintiff  
HUATAI USA, LLC

25 HUATAI USA, LLC v. JOHN CHIANG d/b/a "FCB INTERNATIONAL"

Case No. C11-01855 PJH

STIPULATION EXTENDING TIME FOR DEFENDANT TO  
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**ORDER**

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: 12/20/11



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